## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

ANDRAS SZANTHO, as personal representative of THE ESTATE OF MICHEAL CAMPBELL, deceased, and BRENDA CAMPBELL,

Plaintiffs,

v. No.: 1:14-cv-01156-LH-KK

TRISTATE CAREFLIGHT, LLC, and MARLA HARDY,

Defendants.

## MOTION TO DISMISS ALL CLAIMS AGAINST DEFENDANT TRISTATE CAREFLIGHT, LLC WITH PREJUDICE

COME NOW the Plaintiffs, Andras Szantho as personal representative of the Estate of Micheal Campbell, and Brenda Campbell, by and through their attorney of record, and hereby move the Court to dismiss the above-captioned action, and all claims and causes of action asserted or that could have been asserted herein against Defendant TriState CareFlight, LLC, with prejudice, with each party to bear its own attorney's fees and costs.

Respectfully Submitted, LEE HUNT LAW, LLC

By: /S/ Lee R. Hunt Lee R. Hunt, Esq. 1640 Old Pecos Trail, Suite D Santa Fe, NM 87505 Phone (505) 954-4868 Attorney for Plaintiffs

## **APPROVED:**

Robert C. Conklin Matthew T. Tucker CONKLIN, WOODCOCK & ZIEGLER, P.C. 320 Gold Avenue SW, Suite 800 Albuquerque, NM 87102 Telephone: 505-224-9160

rcc@conklinfirm.com mtt@conklinfirm.com

Attorneys for Defendants TriState Careflight, LLC and Marla Hardy